



Mel Carnahan, Governor • Stephen M. Mahfood, Director

# DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

## MEMORANDUM

DATE: **APR - 1 1999**

TO: Policy Manual

FROM: Roger D. Randolph, Director  
Air Pollution Control Program

A handwritten signature in black ink, appearing to be "RDR", is written over the name "Roger D. Randolph".

SUBJECT: Policies

### Source Testing Policy

#### GENERAL:

All tests must be conducted according to EPA air pollution Reference Methods as cited in 10 CSR 10-6 unless prior approval is obtained for use of an alternative test method. If a reference method has not been published for a particular source or pollutant, proposed methods published in the Federal Register or available from EPA electronic bulletin boards are acceptable.

All Reference Methods must be followed exactly as published in 40 CFR 60 Appendix A or other official EPA publication. Deviations from these methods and procedures must be approved in advance or on site by the APCP representative observing the test.

Unless otherwise specified by a Reference Method or applicable compliance standard, acceptable test results will consist of the average of at least three independent test runs performed at process conditions as nearly identical as practicable. If a test run is questionable, it would be prudent to repeat it in order to ensure that three acceptable runs can be submitted, thus avoiding retesting.

Unless otherwise specified or agreed to in advance, testing shall be conducted under process conditions of maximum load or production unless such conditions do not represent the maximum emission condition for the process.

Testing personnel may be required to provide evidence of their familiarity with source testing methods and procedures. APCP may reject a testing firm if it has a record of questionable competence or probity.

Dates for testing must be proposed at least 30 days in advance and agreed to by APCP.

A complete proposed test plan submitted on forms provided by APCP for this purpose must be submitted at least 30 days in advance of a proposed test date.

APCP may require a pre-test meeting on-site or a pre-test teleconference involving all parties before approving a test plan.

Proposed test methods must be adequate to demonstrate compliance with all relevant parameters specified in permits, local, state and federal regulations, or other requirements applicable to the source under test. Submission of incomplete test reports may subject the source to repetition of all required testing.

APCP will make every possible effort to observe at least a portion of all source tests. Tests may be rejected if APCP or local air agency staff have not been provided the adequate notice (30 days) and opportunity to observe the tests.

Testing to revise emission factors:

Testing intended to develop or revise emission factors used to calculate emission inventory data or determine emission fees will be very closely reviewed by APCP staff.

If test results are to be applied to an entire industry rather than an individual source, the test proposal must include plans to test a representative sample of sources and equipment to which the test result will be applied.

New emission factors may not be used to calculate fees until test results which support them have been approved in writing by APCP staff.

**EMISSION TESTING TO DEVELOP NEW EMISSION FACTORS**

An industry's emission factors are obviously extremely important numbers. In addition to establishing emission fee payments, the emission factor is critical in writing permits for new or modified sources in the industry. For these reasons, the APCP views the development of emission factors as a very precise and resource intensive effort. The

following represent APCP's expectations for such testing. Unique situations at specific facilities may require more rigorous or detailed expectations than those indicated here.

1. The new emission factor(s) will be applied whether higher or lower than the accepted literature value.
2. A range of facilities will be tested, including both those with the latest and best control, and those whose emission control equipment and/or process equipment is "sub standard".

A survey must be conducted to identify the universe of sources and to designate which facilities will be tested. The survey should include specifics of raw feed materials of produce and at least: product mix, control device type, age and size, process equipment size type, age and size.

3. APCP personnel must be informed of proposed dates for testing at least 30 days in advance.
4. APCP personnel will review test reports and process reports before formally approving or rejecting.
5. Standard pre-test and report format protocols will be followed.
6. Only Reference Methods accepted by EPA will be used for source testing.

Testing for PM<sub>10</sub> will be conducted using Methods 201 or 201A, but TSP results will also be reported to determine the proportion of TSP/PM<sub>10</sub>.

7. Rigorous records of control device function will be made throughout testing.

Testing for control device efficiency usually will be required.

8. Testing will be conducted at a range of process rates to determine the relationship of emissions to production. Rigorous records of process variables will be made throughout testing.